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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MAY - 9 2017

SEAN F. McAVOY, CLERK
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

4:17-CR-6019-EFS

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

Vio: 18 U.S.C. § 2252A(a)(5)(B)
Possession of Child Pornography
(Count 1)

v.

WILLIAM RANDOLPH WORDEN,

18 U.S.C. § 2252A(a)(2)
Receipt of Child Pornography
(Count 2)

Defendant.

18 U.S.C. § 2253
Notice of Forfeiture Allegations

The Grand Jury charges:

COUNT 1

(Possession of Child Pornography)

On or about April 19, 2016, through on or about April 27, 2016, in the Eastern District of Washington, the Defendant, WILLIAM RANDOLPH WORDEN, did knowingly possess material which contained one or more visual depictions of child pornography, as defined in 18 U.S.C. § 2256(8)(A), the production of which involved the use of a minor who had not attained 12 years of age engaging in sexually explicit conduct, and which visual depictions were of such conduct; that has been mailed, shipped and transported in interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, or transported in interstate and foreign commerce, by any means including computer, all in violation of 18 U.S.C. § 2252A(a)(5)(B).

Worden Indictment

COUNT 2

(Receipt of Child Pornography)

On or about April 19, 2016, through on or about April 27, 2016, within the Eastern District of Washington, the Defendant, WILLIAM RANDOLPH WORDEN, did knowingly receive any child pornography, as defined in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped and transported in interstate commerce by any means, including by computer, to wit: still image files depicting minor and prepubescent children engaging in sexually explicit conduct including but not limited to actual and simulated intercourse, and the lascivious exhibition of the genitals and pubic area, in violation of 18 U.S.C. § 2252A(a)(2).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253.

Upon conviction of the offense(s) alleged in Counts 1 and 2 of this Indictment, Defendant, WILLIAM RANDOLPH WORDEN, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and, any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property. The property to be forfeited includes, but is not limited to:


1 HP Pavilion 500-424 Tower Computer, Serial Number 4C143912FC.

2
3 DATED this 9th day of May, 2017.

4 A TRUE BILL

5
6 Presiding Juror

7 JOSEPH H. HARRINGTON
8 Acting United States Attorney

9 
10 Thomas J. Hanlon
11 Assistant United States Attorney

12 
13 Laurel J. Holland
14 Assistant United States Attorney